

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

JORDAN T. BRESLOW

An individual,

Plaintiff,

vs.

ALOYSIUS E. GLEESON, an individual,
TOPE LALA, an individual,
GEOFF MIRKIN, an individual,
WILLIAM MCCOLLEY, an individual,
SOLAR ENERGY WORLD, LLC, a
Maryland limited liability company,
SUN RUN, INC., a foreign business
corporation,

Defendants.

CIVIL ACTION NO.: 21-04703

**DEFENDANTS', ALOYSIUS E. GLEESON, TOPE LALA, GEOFF MIRKIN, WILLIAM
MCCOLLEY, AND SOLAR ENERGY WORLD, LLC, MOTION TO DISMISS**

For the reasons set forth in the accompanying memorandum of law, Defendants, Aloysius E. Gleeson, Tope Lala, Geoff Mirkin, William McColley, and Solar Energy World, LLC, by and through their undersigned counsel, respectfully request that the Court enter the accompanying Order pursuant to Fed. R. Civ. P. 12(b)(6) and 12(b)(2), (1) dismissing Plaintiff's claims against the individual named Defendants, Aloysius E. Gleeson, Tope Lala, Geoff Mirkin, and William McColley, with prejudice; and (2) dismissing Plaintiff's claims against Defendant, Solar Energy World, LLC, with prejudice; or (3) in the alternative, transferring this action to a proper venue under 28 U.S.C. § 1406(a).

Respectfully submitted,

JACKSON LEWIS P.C.

/s/ Eileen K. Keefe

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Lala, Geoff Mirkin, William McColley, Solar
Energy World, LLC*

CERTIFICATE OF SERVICE

I hereby certify that I caused to be served a true and correct copy of *Defendant's Motion to Dismiss* and supporting papers to be served upon all recipients via the Court's ECF System, this 28th day of December 2021:

Jordan T. Breslow
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Pro-se Plaintiff

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Attorney for Defendant Sunrun, Inc.

Respectfully submitted,

JACKSON LEWIS P.C.

/s/ Eileen K. Keefe

Eileen K. Keefe